Covered Source Permit Review Summary

Application No.: Renewal Application No. 0382-07
Significant Modification Application No. 0382-08

Permit No.: 0382-02-C

Applicant: Mid Pac Petroleum, LLC

Facility: Kawaihae Terminal
Petroleum Bulk Loading Terminal
61-3651 Kawaihae Road, Kawaihae, Hawaii

Mailing Address: Mid Pac Petroleum, LLC
1100 Alakea St., 8th Floor
Honolulu, Hawaii 96813

Responsible Official: Mr. Jim R. Yates
President
(808) 535-5937

Point of Contact: Mr. Russell Whang
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Plant Manager: Mr. Tim Clark
Terminal Supervisor
(808) 882-7311

Application Dates: Renewal application dated June 25, 2010
Additional information dated October 4, 2013
Significant modification application dated July 8, 2015
Additional information received on August 12 and 13, 2015

Proposed Project:

SICC 5171 (Petroleum Bulk Stations and Terminals)

Renewal Application No. 0382-07
Mid Pac Petroleum, LLC owns and operates an existing petroleum bulk loading terminal located in Kawaihae, Hawaii. The Kawaihae marine terminal receives gasoline, jet fuel, and diesel products from barges in Kawaihae Harbor via a barge header and underground pipeline system. These products are stored in several above ground storage tanks and then bottom loaded into outbound tank trucks at the tank truck load rack. Ethanol is in-line blended with gasoline to produce finished gasoline at the tank truck load rack.

The renewal application fee for a nonmajor, non-toxic covered source of $500.00 was submitted and processed.

Significant Modification Application No. 0382-08
Mid Pac Petroleum, LLC is requesting the following changes to the existing permit:

1. Increase the petroleum tank truck load rack and petroleum barge off-loading headers annual throughput limits. New limits proposed were determined based on projected changes in market demand for transportation fuels (gasoline, ethanol, diesel, and jet fuel).

2. Install a tank truck load rack vapor control device. In order to prevent an increase in VOC emissions from loading higher product volumes, Mid Pac would like to install a vapor combustion unit (VCU) to serve as a control device for gasoline and ethanol vapors generated at the tank truck load rack. The VCU would be approximately thirty (30) feet in height, have a vapor burn capacity of approximately 180 cubic feet per minute, require no steam assist, and burn propane as pilot/assist gas. It will be installed on a concrete pad and require minimal changes to the site's grading and containment. In October 2014, the U.S. EPA alleged violations of NSPS Subpart XX. The applicability of NSPS Subpart XX at this facility remains the subject of ongoing discussions with the EPA. Those discussions may end in an agreement that the facility will be subject to Subpart XX, but Mid Pac Petroleum has disputed applicability in that proceeding to date. For the purposes of processing this permit application, however, Mid Pac Petroleum requests that the Department of Health assume that the facility is subject to Subpart XX.

3. Install a portable emergency backup generator. This diesel engine will be ≤ 300 bhp in size and used temporarily to supply backup electrical power to the terminal in the event of an emergency. The generator will include an EPA-designated Tier 4 engine and burn ultra low sulfur diesel fuel.

4. Install a 8,000 gallon aboveground gasoline additive storage tank. Mid Pac currently uses smaller 350 gallon totes, and would like to increase the storage capacity of gasoline additive in support of higher annual gasoline throughputs.

5. Install a 1,000 gallon aboveground diesel storage tank with dispenser pump and nozzle. Mid Pac would like to add a diesel truck refueling station to accommodate the higher frequency of truck loading at the terminal.

6. Change product service for Tank Nos. 4130, 4132, and 4133 from gasoline to gasoline/ethanol/jet/diesel. In order to gain operational flexibility, Mid Pac would like the ability to store ethanol, diesel, and jet fuel interchangeably in any of the three (3) primary gasoline tanks. This flexibility would allow the terminal to operate during periods when one (1) or more tanks are out of service (e.g., inspections, maintenance, and repairs). This would require minimal new connective piping. These commodity changes would occur primarily in response to taking out of service either Tank No. 4129 (ethanol) or Tank No. 4134 (jet/diesel).

7. Complete improvements to tank truck load rack. Increase truck loading rates for all products from 400 gpm to approximately 600 gpm by installing new, more efficient pumps, piping, and batch control equipment (batch controller, meter, strainer, control valve, and additive injector). Additionally, reposition jet fuel loading arm to service the second truck loading bay.

The significant modification (< 40 tpy) application fee for a nonmajor, non-toxic covered source of $500.00 was submitted and processed.

Equipment Description:

Petroleum Storage Tanks

Tank No.	Type of Tank	Storage Capacity (barrels)	Permitted Product Stored	Typical Product Stored	Year Built
4129	Internal Floating Roof	1,600	Gasoline	Ethanol	1959
4130	Internal Floating Roof	4,000	Gasoline	Gasoline	1959
4132	Internal Floating Roof	7,500	Gasoline	Gasoline	1959
4133	Internal Floating Roof	10,100	Gasoline	Gasoline	1959

Loading Units

Equipment	Product	Year Built
Petroleum Tank Truck Load Rack	Gasoline, Ethanol, Diesel No. 2, Jet Fuel	1960
Petroleum Barge Off-Loading Headers	Gasoline, Diesel No. 2, Jet Fuel	1960
One (1) 12.4 MMBtu/hr John Zink enclosed flame vapor combustion unit, model no. ZCT-2-5-30-X-2/6-Flanged with a thirty (30) foot exhaust stack height. No steam assist. Uses propane for pilot gas.	Gasoline, Ethanol	

Maximum Allowable Throughputs of Loading Units

Product	Petroleum Truck Loading Rack	Barge Off-Loading Headers
Gasoline	1,460,000 barrels per year (proposed) 333,000 barrels per year (existing)	1,460,000 barrels per year (proposed) 333,000 barrels per year (existing)
Ethanol	162,060 barrels per year (proposed) 37,000 barrels per year (existing)	n/a
Diesel No. 2 and Jet Fuel	1,095,000 barrels per year (proposed) 728,000 barrels per year (existing)	1,095,000 barrels per year (proposed) 728,000 barrels per year (existing)

Air Pollution Controls:

Storage tank VOC emissions are controlled using the following air pollution controls: Tank no. 4129 will be equipped with a NSPS Subpart Kb internal floating roof and seals. Tank nos. 4130, 4132 and 4133 are equipped with internal floating roofs and seals. The petroleum tank truck load rack is bottom loading and will have a VCU to control VOC emissions.

Applicable Requirements:

Hawaii Administrative Rules (HAR)
Title 11, Chapter 11-59, Ambient Air Quality Standards
Title 11, Chapter 11-60.1, Air Pollution Control
Subchapter 1, General Requirements

Subchapter 2, General Prohibitions
11-60.1-31 Applicability
11-60.1-39 Storage of Volatile Organic Compounds
Subchapter 5, Covered Sources
Subchapter 6, Fees for Covered Sources, Noncovered Sources, and Agricultural Burning
11-60.1-111 Definitions
11-60.1-112 General Fee Provisions for Covered Sources
11-60.1-113 Application Fees for Covered Sources
11-60.1-114 Annual Fees for Covered Sources
11-60.1-115 Basis of Annual Fees for Covered Sources
Subchapter 8, Standards of Performance for Stationary Sources
Subchapter 9, Hazardous Air Pollutant Sources
11-60.1-174 Maximum Achievable Control Technology (MACT) Emission Standards

Federal Requirements
40 Code of Federal Regulations (CFR) Part 60 – Standards of Performance for New Stationary Sources (NSPS)

40 CFR Part 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 – is applicable to Tank No. 4129.

40 CFR Part 60, Subpart XX - Standard of Performance for Bulk Gasoline Terminals – the applicant has voluntarily requested Subpart XX be applicable to the petroleum tank truck load rack.

40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (Maximum Achievable Control Technologies (MACT) Standards)

40 CFR Part 63, Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities - is applicable to all tanks in gasoline service (Tank Nos. 4129, 4130, 4132, and 4133), the petroleum tank truck load rack, and fugitive components in gasoline service and as an existing facility, is required to be in compliance no later than January 10, 2011. Using the proposed throughput change of 1,460,000 barrels of gasoline per any rolling twelve-month (12-month) period, the petroleum tank truck load rack has a total throughput of less than 250,000 gallons per day of gasoline. Per the requirements in Table 2 of Subpart BBBBBB, the facility is in compliance as it uses submerged filling with a submerged fill pipe (no more than six (6) inches from the bottom of the cargo tank) and keeps records of all throughputs that are available upon request.

Non-Applicable Requirements:

Hawaii Administrative Rules (HAR)
Title 11, Chapter 11-60.1, Air Pollution Control
Subchapter 7, Prevention of Significant Deterioration Review
Subchapter 9, Hazardous Air Pollutant Sources
11-60.1-180 National Emission Standards for Hazardous Air Pollutants

Federal Requirements
40 CFR Part 52.21 - Prevention of Significant Deterioration of Air Quality

40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPS)

40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories (Maximum Achievable Control Technologies (MACT) Standards)

40 CFR Part 63, Subpart R - National Emission Standards for Hazardous Air Pollutants for Gasoline Distribution Facilities - is not applicable to the facility because the facility is not a major source of HAPs.

Prevention of Significant Deterioration (PSD):

This source is not a major stationary source nor are there modifications proposed that by itself constitute a major stationary source that is subject to PSD review. Therefore, a PSD review is not applicable.

Best Available Control Technology (BACT):

A Best Available Control Technology (BACT) analysis is required for new covered sources or significant modifications to covered sources that have the potential to emit or increase emissions above significant amounts as defined in HAR §11-60.1. A BACT analysis for this source is not applicable. See table below.

Pollutant	Post-Project Potential Emissions [1] (tpy)	Pre-Project Potential Emissions [2] (tpy)	Emissions Increase (tpy)	Significant Level (tpy)	Significant?
NO_x	1.85	0	1.85	40	No
SO_2	0	0	0	40	No
CO	3.26	0	3.26	100	No
PM	0.47	0	0.47	25	No
PM_{10}	0.47	0	0.47	15	No
VOC	27.07	94.61	- 67.54	40	No

[1] Post-project potential emissions are based on a proposed maximum throughput of 1,460,000 barrels of gasoline, 162,060 barrels of ethanol, and 1,095,000 barrels of diesel no. 2/jet fuel per any rolling twelve-month (12-month) period for the load rack/VCU and storage tanks, new gasoline additive tank, diesel refueling tank, and fugitive components.

[2] Pre-project potential emissions are based on the current facility's throughput limits of 333,000 barrels of gasoline, 37,000 barrels of ethanol, and 728,000 barrels of diesel no. 2/jet fuel per any rolling twelve-month (12-month) period for the load rack and storage tanks, and fugitive components.

Compliance Assurance Monitoring (CAM):

The purpose of Compliance Assurance Monitoring (CAM) is to provide a reasonable assurance that compliance is being achieved with large emissions units that rely on air pollution control device equipment to meet an emissions limit or standard. Pursuant to 40 CFR Part 64, for CAM to be applicable, the emissions unit must: (1) be located at a major source; (2) be subject to an emissions limit or standard; (3) use a control device to achieve compliance; (4) have potential pre-control emissions that are 100% of the major source level; and (5) not otherwise be exempt from CAM. CAM is not applicable because this is not a major source.

Air Emissions Reporting Requirements (AERR):

40 CFR Part 51, Subpart A – Air Emissions Reporting Requirements, is based on the emissions of criteria air pollutants from Type B point sources (as defined in 40 CFR Part 51, Subpart A), that emit at the AERR triggering levels as shown in the table below.

Pollutant	Type B AERR Triggering Levels [1] (tpy)	Pollutant	In-house Total Facility Triggering Levels [1] (tpy)	Potential Emissions (tpy)
NO_x	≥ 100	NO_x	≥ 25	1.85
SO_x	≥ 100	SO_x	≥ 25	0
CO	≥ 1000	CO	≥ 250	3.26
$PM_{10}/PM_{2.5}$	≥ 100/100	PM/PM_{10}	≥ 25/25	$PM/PM_{10}/PM_{2.5}$ = 0.47
VOC	≥ 100	VOC	≥ 25	27.07
Pb	≥ 0.5 (actual)	Pb	≥ 5	0
		HAPs	≥ 5	0.77

[1] Based on potential emissions

This facility does not emit at the AERR triggering levels. Therefore, AER requirements are not applicable.

Although AERR for the facility is not triggered, the Clean Air Branch requests annual emissions reporting from those facilities that have facility-wide emissions of a single air pollutant exceeding in-house triggering levels or is a covered source. Annual emissions reporting for the facility will be required for in-house recordkeeping purposes since this is a covered source.

Synthetic minor:

A synthetic minor is a facility that without operational limitations, emits above the major source triggering levels as defined by HAR §11-60.1-1, but is made non-major by using operational limitations. This facility is a synthetic minor.

Project Emissions:

Source	VOC Emissions (tpy)
Tank 4129	2.16 [3]
Tank 4130	2.59 [2]
Tank 4132	1.43 [2]
Tank 4133	1.91 [2]
Tank 4134	0.79 [4]
Tank Truck Load Rack (fugitives, not captured by VCU)	7.92 [2]
VCU	10.01 [5]
Fugitive Components	0.19
Gasoline Additive (IVD) Tank (insignificant activity)	0.07
Diesel Refueling (Saddle) Tank (insignificant activity)	0
Total Emissions	27.07 [1]

VCU Criteria Pollutants Emissions

Pollutants	tpy
CO	3.26
NO_x	1.85
SO_2	0
PM_{10}	0.47
$PM_{2.5}$	0.47

HAP Emissions

Pollutants	tpy
Benzene	0.08
Ethylbenzene	0.02
n-Hexane	0.38
Toluene	0.28
Xylenes (Mixed Isomers)	0
Methanol	0
Naphthalene	0.01
Cumene	0
Total HAP Emissions	0.77

Notes:

1 Emissions from other insignificant activities are assumed to be negligible. Other insignificant activities include: petroleum barge loading headers, two (2) portable storage tanks, jet processing equipment, portable water and sediment tank, portable jet fuel sample tank, and ethanol off-loading skid.

2 Based on a throughput limit of 1,460,000 barrels of gasoline, 162,060 barrels of ethanol, and 1,095,000 barrels of diesel no. 2/jet fuel, per any rolling twelve-month (12-month) period.

3 Based on a throughput limit of 162,060 barrels of ethanol per any rolling twelve-month (12-month) period.

4 Based on a throughput limit of 1,095,000 barrels of diesel no. 2/jet fuel per any rolling twelve-month (12-month) period.

5 Based on a throughput limit of 1,460,000 barrels of gasoline and 162,060 barrels of ethanol, per any rolling twelve-month (12-month) period.

6 Only gasoline and denatured ethanol loading operations will be controlled by the VCU.

7 Tank truck load rack emission rate uses a vapor recovery operational standard of 35 mg/liter (NSPS Subpart XX).

8 NO_x, and CO emission factors provided by manufacturer (John Zink).

9 PM emission factor from EPA ICR Protocol.

10 VCU is expected to operate 18 hours/day maximum.

11 VCU emissions includes propane pilot and assist gas combustion.

12 VCU has a capture efficiency of 98.7% and a destruction efficiency of 98.0%.

Greenhouse Gas (GHG) Emissions:

This facility is not subject to PSD for GHG emissions because it does not emit GHG emissions greater than 100,000 tpy CO_2e. See table below.

Fuel	CO_2 (tpy)	CH_4 (tpy)	N_2O (tpy)	CO_2e (tpy)
VCU Pilot Gas (Propane)	678.04	0.03	0.07	698.60
VCU Load Rack Vapors (Gasoline)	2469.17	0.11	0.21	2534.68
Total Emissions (Short Tons)	3147.21	0.14	0.28	3233.28

Alternate Operating Scenarios:

The applicant did not propose any alternate operating scenarios.

Insignificant Activities:

All activities listed below qualify per HAR §11-60.1-82(f)(7).

1. One (1) fixed roof tank no. 4134 (18,100 bbls) - low sulfur diesel/jet fuel storage;
2. Two (2) portable storage tanks (350 gallons each) - additive storage;
3. Ethanol off-loading skid
   a. Off-loads ethanol from tank trucks into petroleum storage tanks,
   b. Consists of hose, pump header and related piping;
4. Transfer Pump – located at the discharge of tank no. 4134;

5. Filter/separator system – removes sediment and water from jet fuel downstream of tank no. 4134, consists of two vessels each containing an internal filter and coalescer;
6. Tank no. 4134 water removal system – removes water from tank no. 4134 bottoms, consists of a collection tank and pump;
7. Portable storage tank – water and sediment drained from filter/separator vessels;
8. One (1) emergency diesel engine generator, 300 bhp or less;
9. One (1) gasoline additive (IVD) tank (8,000 gallons); and
10. One (1) diesel refueling dispenser and (saddle) tank (1,000 gallons).

Ambient Air Quality Assessment:

The applicant conducted an ambient air quality impact analysis (AAQIA) to determine the emissions impact on the ambient air quality from the proposed vapor combustion unit (VCU).

The analysis used the EPA's AERSCREEN model to quantify ambient air pollutant impacts in the surrounding area. Using a screening modeling analysis such as AERSCREEN will give more conservative results than using a refined modeling analysis such as AERMOD.

Hourly emission averages were calculated based on two separate operating scenarios for the tank truck loading rack and VCU.

1. Maximum annual loading rate (1,460,000 bbls/yr of gasoline, eighteen (18) hrs/day) and the most conservative VCU stack temperature (1400 °F); and
2. Maximum instantaneous loading rate (600 gpm of gasoline) and the most conservative VCU stack temperature (1400 °F).

The parameters used in the AERSCREEN model consisted of the following:

- Flat terrain option (terrain height below stack base elevation)
- Rural dispersion Downwash effects from tank no. 4133
- Meteorology parameters consisting of the following:
  Min/Max temperature = 30 °F/78 °F
  Minimum wind speed = 0.5 m/s
  Anemometer height = ten (10) meters
  Surface characteristics input = AERMET seasonal tables
  Dominant surface profile = urban
  Dominant climate type = average moisture

Stack Parameters

Equipment	Stack Parameters						
	Height (ft)	Temp. (°F)	Velocity (ft/s)	Diameter (ft)	NO_x to NO_2 chemistry	NO_2/NO_x in-stack ratio	O_3 Background Concentration (ppm)
VCU	30	1400	24.9	5	PVMRM	0.1	0.047

VCU Downwash Parameters	
Building Height	40 ft
Building Width	42.5 ft
Building Length	42.5 ft
Stack Distance from Center Point	80 ft

Parameter	VCU
Dominant Season (maximum concentration)	Winter
Albedo	0.35
Bowen Ratio	1.5
Roughness Length	1 meter

Maximum Modeled Impacts for the VCU

Pollutant	Averaging Period	Scenario 1- Annual Max Loading Rate		Scenario 2 – Instantaneous Max Loading Rate	
		VCU Emission Rate (g/s)	VCU Maximum Modeled Concentration [a] ($\mu g/m^3$)	VCU Emission Rate (g/s)	VCU Maximum Modeled Concentration [a] ($\mu g/m^3$)
NO_2	Annual	0.07108	4.2	0.15152	9.0
	1-hr	0.07108	21.1	0.15152	45.0
SO_2	Annual	-	-	-	-
	24-hr	-	-	-	-
	3-hr	-	-	-	-
	1-hr	-	-	-	-
CO	8-hr	0.12494	37.1	0.37879	112.5
	1-hr	0.12494	41.2	0.37879	125.0
PM_{10}	Annual	0.01799	1.2	0.06216	4.1
	24-hr	0.01799	3.6	0.06216	12.3
$PM_{2.5}$	Annual	0.01799	1.2	0.06216	4.1
	24-hr	0.01799	3.6	0.06216	12.3

[a] The State of Hawaii default scaling factor of 0.2 was used for the annual concentrations

The predicted ambient air quality impacts are shown in the table below. The table demonstrates that the impacts of NO_2, SO_2, CO, PM_{10}, and $PM_{2.5}$ from the VCU plus background air quality levels should not cause or contribute to a violation of any State or National ambient air quality standard.

Predicted Ambient Air Quality Impacts for VCU (Scenario 1- Annual Max Loading Rate)

Pollutant	Averaging Period	VCU Maximum Modeled Concentration ($\mu g/m^3$)	Measured Background Concentration [a] ($\mu g/m^3$)	Maximum Total Concentration ($\mu g/m^3$)	AAQS [b] ($\mu g/m^3$)	Percent of AAQS (%)
NO_2	Annual	4.2	6	10.2	75	14
	1-hr	21.1	58	79.1	188	42
CO	8-hr	37.1	1183	1220.1	5000	24
	1-hr	41.2	1489	1530.2	10000	15
PM_{10}	Annual	1.2	15	16.2	50	32
	24-hr	3.6	39	42.6	150	28
$PM_{2.5}$	Annual	1.2	5.1	6.3	12	52
	24-hr	3.6	13	16.6	35	47

[a] Background concentrations are based on the Kapolei Monitoring Station for all pollutants. The data from 2013 was used. The 1st high maximums were used for all pollutants, except for $PM_{2.5}$ which used the 98th percentile.

[b] Only the more restrictive of the National Ambient Air Quality Standards or State Ambient Air Quality Standards are shown.

Predicted Ambient Air Quality Impacts for VCU
(Scenario 2 – Instantaneous Max Loading Rate)

Pollutant	Averaging Period	VCU Maximum Modeled Concentration ($\mu g/m^3$)	Measured Background Concentration [a] ($\mu g/m^3$)	Maximum Total Concentration ($\mu g/m^3$)	AAQS [b] ($\mu g/m^3$)	Percent of AAQS (%)
NO_2	Annual	9.0	6	15.0	75	20
	1-hr	45.0	58	103.0	188	55
CO	8-hr	112.5	1183	1295.5	5000	26
	1-hr	125.0	1489	1614.0	10000	16
PM_{10}	Annual	4.1	15	19.1	50	38
	24-hr	12.3	39	51.3	150	34
$PM_{2.5}$	Annual	4.1	5.1	9.2	12	77
	24-hr	12.3	13	25.3	35	72

[a] Background concentrations are based on the Kapolei Monitoring Station for all pollutants. The data from 2013 was used. The 1st high maximums were used for all pollutants, except for $PM_{2.5}$ which used the 98th percentile.

[b] Only the more restrictive of the National Ambient Air Quality Standards or State Ambient Air Quality Standards are shown.

The existing petroleum storage tanks and petroleum tank truck load rack also emit fugitive VOCs and any HAPs associated with these VOCs. An ambient air quality impact assessment is not required for the following reasons: 1) VOCs do not have an ambient air quality standard, and 2) the Department of Health air modeling guidance generally exempts an applicant from performing an ambient air quality impact assessment for fugitive sources (storage tanks, pipe leaks, etc.).

Significant Permit Conditions:

Significant permit conditions include the following:

1. Included 40 CFR Part 63, Subpart BBBBBB as an applicable regulation for petroleum storage tanks nos. 4129, 4130, 4132, and 4133, and the petroleum tank truck load rack when in gasoline service, and each piece of equipment that transfers gasoline or gasoline vapors.

2. Included 40 CFR Part 60, Subpart XX as an applicable regulation for the petroleum tank truck load rack using a vapor combustion unit as a control device for VOCs.

3. Increased the petroleum tank truck load rack's throughput limit as follows:

    a. The maximum throughput of the petroleum tank truck load rack shall not exceed 1,460,000 barrels of gasoline per rolling twelve-month (12-month) period.
    b. The maximum throughput of the petroleum tank truck load rack shall not exceed 162,060 barrels of ethanol per rolling twelve-month (12-month) period.
    c. The maximum throughput of the petroleum tank truck load rack shall not exceed 1,095,000 barrels of diesel no. 2 and jet fuel combined per rolling twelve-month (12-month) period.

4. Increased the petroleum barge off-loading headers throughput limit as follows:

    a. The maximum throughput of the petroleum barge off-loading headers shall not exceed 1,460,000 barrels of gasoline per rolling twelve-month (12-month) period.
    b. The maximum throughput of the petroleum barge off-loading headers shall not exceed 1,095,000 barrels of diesel no. 2 and jet fuel combined per rolling twelve-month (12-month) period.

Conclusion/Recommendation:

Recommend issuing the renewal/significant modification for Covered Source Permit (CSP) No. 0382-02-C, subject to the significant permit conditions described above, a thirty-day (30-day) public comment period, and a forty-five-day (45-day) EPA review period.

Reviewer: Darin Lum
Date: 9/2015